

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Pulaski Community School District

Agency Code: 05-4613

School(s) Reviewed: Lannoye and Fairview Elementary Schools

Review Date(s): January 24-26, 2017

Date of Exit Conference: 1/26/2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (School District)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.
- Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.
- School Districts are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Sincere thanks to the Food Service Director of Pulaski Community School District. We appreciate the time and efforts spent preparing for and participating in the administrative review. The Food Service Director is well-organized, responsive, and thorough. Great use of creative names and social media to encourage participation and selection of reimbursable meal components. Well done!

Thank you to all the staff for the courtesies extended during the on-site review. The entire Food Service Staff were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

Students at Fairview and Lannoye elementary schools were very polite, showed good manners, and had an appropriate noise level in the cafeteria. This demonstrates the respect the Food Service Staff have for students because what is modeled for students is returned by students. Great Job!

Review Areas

Meal Access and Reimbursement: Certification and Benefit Issuance, Verification, Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders:

Certification and Benefit Issuance

- 351 eligibility determinations were reviewed, No errors were identified. Any questions I had regarding applications were quickly answered. The program assistant is doing a great job!

Applications

- All free/reduced applications and the direct certification runs were available for review. All the reviewed applications have been approved correctly and students are receiving the benefits they have been determined eligible for.
- When benefit's eligibility status increases, the change must take place within 3 days. When benefit's eligibility decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with appeal rights procedures.

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

As a reminder, for the household members' size box:

- If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the School District is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.
- If the Total Household Members box has not been completed, the School District is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

Meal Pattern and Nutritional Quality: Meal Components and Quantities, Offer versus Serve, Dietary Specifications and Nutrient Analysis

Comments/Technical Assistance/Compliance Reminders:

Production Records

- The production record template currently in use is out of date and uses language that is not currently applicable (Traditional and Enhanced meal pattern, four of five as an option for Offer Versus Serve [OVS] at lunch, etc.). While there is no required production record template, there are some examples that may be used on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. A copy of the production record requirements (“Must haves and Nice to haves” list) can also be found there.
- The column “Quantity Prepared” is not consistently written as portions or purchase units. Please alter this columns so the following required information can be distinguished:
 - Total number of purchase units prepared
 - Total number of portions prepared and number of portions left over
- All sections of the production record must be filled in completely each day. Serving sizes for condiments were unlisted. “Planned Servings” was frequently left blank. Serving sizes and planned servings were not recorded for adult meals, though adult meals were sold. Daily production records show portion sizes of meal components were appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.
- Serving sizes recorded on the production records were not consistently in agreement with serving sizes on standardized recipes. Inconsistency may result in shortages of daily and/or weekly minimum requirements.
- Production records for Lannoye Elementary School list meat/meat alternate and grains in terms of crediting (e.g. 2M, 2B). Please ensure staff know how many cups, ounces, items, etc. to serve for crediting to be accurate.

Vegetable Subgroups

- Each vegetable subgroup has a specific minimum weekly requirement. These requirements are outlined on the Lunch Meal Pattern Table, located at the following address: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>. During the week of review, the beans/peas vegetable subgroup minimum weekly requirement was not met. The serving size for refried beans is 1/4 cup, resulting in a 1/4 cup shortage.

Standardized Recipes

- Standardized recipes are required for all menu items that have more than one ingredient. All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made. Instructions for standardizing recipes and recipe templates can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

- I recommend reviewing the standardized recipes for fruit fluff and Red Raider Pasta Bake for accuracy. The amount of fruit cocktail used in the fruit fluff recipe is insufficient for one hundred fifty 1/2 cup portions. Additionally, I calculated 2.25 ounce equivalents of meat/meat alternate per 3/4 cup serving of the pasta bake, which is 0.25 ounce equivalents more than recorded on the production record.

Crediting Documentation

- Food manufacturers continually reformulate products used in schools. It is important to stay current with these changes and be confident the documentation on file matches the products in stock. These records should be reviewed and updated at least annually and as new products are purchased or substituted. Also, please be sure to discard any outdated crediting information for products that have changed or are no longer purchased. State-Processed Products and USDA Brown-Box Foods have fact sheets, detailing meal pattern contributions. The fact sheets are updated annually. USDA Brown-Box Foods fact sheets can be found here: <http://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>. State-Processed Products fact sheets can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed_nutritioninfo_1617.pdf.
- The crediting documentation submitted for the Uncrustable peanut butter and jelly sandwich and mini corn dogs is outdated.

Resource Management: Risk Assessment and Comprehensive Review of Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Non-program Foods, Indirect Costs

Comments/Technical Assistance/Compliance Reminders:

Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its “yearly” reference period for non-program food compliance which is highly recommended. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc> and a short webinar can be found here: <https://media.dpi.wi.gov/school-nutrition/administrative-review-section-3/story.html>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending balance, on June 30, can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered “Excess Cash Balance”.
- Items should be addressed when tracking revenues and expenditures moving forward include:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.

- Under “Ala Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
- When revenues are recorded from the federal reimbursement payments, you want to make sure you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.

Paid Lunch Equity

- The Paid Lunch Equity tool must be completed yearly and prices raised accordingly with a maximum yearly increase of \$0.10 as required by regulation.
- Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. Great job running this tool!

Revenue from Non-program Foods

- Non-program Foods Revenue Rule Memo SP-20-2016 located here <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf> gives guidance on:
 - Non-program foods which include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
 - All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
 - Non-program Food costs and revenues must be separated from Program Food costs and revenues.
 - The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The DPI Non-program Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.
- Non-program Foods in a nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.

General Program Compliance: Civil Rights, On-site Monitoring, Local School Wellness Policy and School Meal Environment, Smart Snacks in Schools, Professional Standards, Water, Food Safety, Storage and Buy American, Reporting and Recordkeeping, SBP and SFSP Outreach

Comments/Technical Assistance/Compliance Reminders

Civil Rights Nondiscrimination Statement

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was just

updated in October 2015 <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so it can be printed in the same size font as the other printing in the document.

And Justice for All Poster

- “And Justice for All” posters need to be posted in public view.
- We appreciated the lunch room area had the food safety inspection and an “And Justice for All” poster posted on the cafeteria wall so the public can read the information.

Civil Rights Training

- Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.

Civil Rights Self-Compliance Form

- The Civil Rights Self-Evaluation Compliance form is required to be completed by October 31 annually.

Special Dietary Needs

- Special dietary accommodations were discussed. If providing a fluid milk substitute for students who are lactose intolerant, it cannot be juice, unless based on a documented disability by a medical practitioner. Water is available to all students, a lactose free milk could be offered or you can provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. If choosing to provide a fluid milk substitute, you must notify our office in writing and provide us the nutritional panel from the product you will be using. For more information on fluid milk substitutes, <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>. Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program (WSDMP). The WSDMP allows juice as a milk substitution. Lactose-free milk is currently allowed as part of the reimbursable school meal. School Districts may offer it to children who have lactose intolerance without requiring documentation. If schools offer lactose-free milk, there is no need to offer a fortified milk substitute, or seek pre-approval for use. See SP 07-2010
- All food substitutions for children with disabilities must be documented by a licensed medical professional. We have a prototype Medical Form posted on our website that is also available in Spanish and Hmong that you can use http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/special_dietary_requests_form.pdf. When the form is completed indicating the special dietary request is based on a disability, the school is required to provide a meal that meets the child’s needs as documented. The meal would not have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child. Additional information on Special Dietary Needs can be found on the DPI School Nutrition Team website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.
- School food service staff may make food substitutions, at their discretion, for individual children who do not have a disability. The school must still have a completed Dietary Request Form on file from a medical authority (could be a school nurse) certifying the student as having a special medical or dietary need. Such determinations are only made on a case-by-case basis and all

accommodations must be made according to the USDA's meal pattern requirements in order to claim them for reimbursement.

Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure this is included in the district procedures to ensure compliance.
- All School Districts should have procedures (written procedures preferred) in place for handling civil rights complaints in regards to discrimination in the National School Lunch Program and School Breakfast Program. A School District may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the School District must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf

On-site Monitoring

- Every school year, each School District with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the School District by February 1.
- The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the School District, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016 <http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.
- The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the School District onsite monitoring section.

Local Wellness Policy and School Meal Environment

- Under the Healthy Hunger-free Kids Act of 2010, all School Food Authorities are required to have a written Local Wellness Policy (LWP) and have an active Wellness Committee. Information on school wellness policies may be found on our website at <http://dpi.wi.gov/school-nutrition/wellness-policy>.
 - LWPs should include language related to nutrition education, nutrition promotion, nutrition guidelines available for all foods on campus, physical education, and physical activity.
 - School District must inform the public about the content of the local school wellness policy (LWP) and retain documentation regarding the notification.
 - School District must review and update local school wellness policy (LWP) on a periodic basis (recommended annually) and retain documentation demonstrating how this requirement is met.

- School Districts must permit parents, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the School District, and the general public to be involved in the development, implementation, periodic review, and update of the local school wellness policy (LWP). School District wellness committees should include a diverse team of committed school and community stakeholders. School Districts are required to actively seek members for the wellness committee that represent each of the above categories and retain documentation of notification of participation availability.
- The School District must conduct an assessment of the implementation of local school wellness policy (LWP) every 3 years. School Districts are required to retain a copy of the assessment on file. The assessment should include the extent to which School Districts are in compliance with their LWP; the progress made toward attaining the goals of the LWP; and the extent to which the School District's LWP compares to a model policy. *Implementation-Monitoring Plan* template has been developed to assist School Districts to assess their LWP progress. This is found on page 43 of the *Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit* (http://fns.dpi.wi.gov/fns_wellnesspolicy2).
- School District is required to inform and update the public (including parents, students, and others in the community) about the assessment of the implementation of (LWP). School Districts are required to retain a copy of the assessment and documentation regarding the public notification.

Smart Snacks in Schools

- All foods (vending machines, school stores, etc.) sold anywhere on school campus, between midnight and 30 minutes after the last bell, must be in compliance with the new “Smart Snacks” regulation that was effective on July 1, 2014. Information on this regulation, along with a product calculator to help determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year. A fundraiser cannot exceed two weeks in time. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but may not compete directly with the sale of reimbursable meals. All food fundraisers must be tracked School District-wide to assure compliance with the regulation. Copies of the tools are available on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.
- The food service department is doing a wonderful job of checking all products they sell for Smart Snacks compliance. Great work!

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked and documented.
- The hiring standards for School District directors are based on the size of their School District and includes education, school nutrition experience and food safety training requirements <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay

their salary; this would be an unallowable cost and the School District's general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- School Districts should clearly document all required training information and maintain the file including the name of staff person, date hired, title/position, brief list of core duties, responsibilities, status (full, part-time, volunteer, etc.), and professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Annual Training Requirements for All Staff

If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Other Staff	Part Time Staff
	(20 hrs or more/week)	(less than 20 hrs/week)	
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Water

- Water is required to be available at no charge to students during the lunch and breakfast meal services. Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups. It was great to see cups were available at the cashers stand for students to use in getting water.

Food Safety Inspections

- Every school operating USDA School Child Nutrition programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan.

Temperatures

- All pieces of cooling equipment must have the internal temperature taken and recorded daily on a temperature log. Having them posted right on the actual piece of equipment makes recording convenient. Good job with this requirement!

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious food service staff at Fairview and Lannoye elementary schools are very knowledgeable about foodservice practices. All temperature logs, calibration logs and sanitizing solution logs were up to date.

- School Districts are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable.
- Thank you for maintaining a Food Safety plan with equipment, food processes 1-2-3 and Standard Operating Procedures (SOP).

Storage

- School Districts are required to ensure facilities for the handling, storage, distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss. The on-site storage areas were reviewed, including freezers, refrigerators, and dry good storage rooms. Really a good job in having all reviewed areas neat, tidy, and clean!

Time as Public Health Control

When using “Time as a Public Health (Temperature) Control”:

- The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
- Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
- The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
- **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

Buy American

- The USDA requires a School Districts to purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by School Districts or entities who are purchasing on the schools behalf.

- The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures the bidder is responsive and responsible to the solicitation.
- There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

Reporting and Recordkeeping

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- All free and reduced price applications, including applications from households denied benefits must be kept on file for a minimum of three years after the final claim is submitted for the fiscal year to which they pertain.

SBP and SFSP Outreach

- At the beginning of the school year, the School District must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

Breakfast Promotion

- Some ideas for increasing participation for breakfast should be considered. One idea would be to look at offering breakfast as a mid-morning breakfast either out of the kitchen or in the classroom. More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>.
- A Breakfast in the Classroom Toolkit is also available if that option is considered: http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf
- Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our website: <https://www.youtube.com/watch?v=aHR7eECbKaE>
- For more ideas on breakfast menus, visit our On, Wisconsin! Cycle Menu or look up menus for other schools in Wisconsin.
 - Cycle Menu Resources: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/cycle-menu>
 - School Breakfast Menus on the Web: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>
- National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not currently operated

USDA would like all School Districts to inform families of where their students can receive a free meal in the summer months. School Districts can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>.
- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it can be as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
e-mail: amy.kolano@dpi.wi.gov

Corrective Actions

Meal Pattern Finding #1:

Production records are not filled in completely.

Required Corrective Action:

Please submit production records for two full days with all sections filled in completely by February 24, 2017.

Meal Pattern Finding #2:

Weekly vegetable subgroup requirements are not being met.

Required Corrective Action:

Please submit a statement describing how you will alter the menu to meet the requirements going forward by February 24, 2017.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit <http://dpi.wi.gov/statesupt/agenda-2017>.

